

# CRAVATH

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July 21, 2023

*In re Google Digital Advertising Antitrust Litigation, No. 1:21-md-03010 (PKC);  
Singh v. Google LLC, No. 1: 23-cv-03651 (PKC)*

Dear Judge Castel,

We represent Meta Platforms, Inc. (“Meta”) in the above-captioned multidistrict litigation (“MDL”). We write in regards to the *Singh v. Google LLC* action, centralized into the MDL for pre-trial proceedings pursuant to Conditional Transfer Order No. 10 (Dkt. No. 534). In accordance with Rule 1.A of the Court’s Individual Practices, we note there is no conference currently scheduled before the Court.

Mr. Sunny Singh filed an action on behalf of advertisers against Google LLC (“Google”), Alphabet Inc. (“Alphabet”) and Meta in the Central District of California (23-cv-02539) on April 4, 2023—*after* the motion to dismiss briefing on the Advertisers’ Consolidated Amended Complaint (the “Advertisers’ CAC”, Dkt. No. 399) was completed on March 31, 2023 in the MDL. In light of the significant overlaps between the complaints, to save the Court from having to review and evaluate the same arguments, Defendants Google, Alphabet, Meta and Plaintiff reached a stipulation that any ruling by the Court on the pending motions to dismiss the Advertisers’ CAC, except a ruling regarding issues of individual named plaintiffs’ obligations to arbitrate claims against Defendants Google and Alphabet, would be deemed to apply to the Singh Complaint. Google will be entitled to request leave to file a motion not to exceed 5 pages regarding Mr. Singh’s alleged obligation to arbitrate any claims that may not otherwise be dismissed. Plaintiffs and Meta reserve all rights concerning that issue.

Accordingly, Meta respectfully requests that the Court enter into the agreed stipulation and proposed order attached hereto as Exhibit A. We would be happy to discuss the matter further if the Court wishes.

Respectfully,

/s/ Kevin J. Orsini

Kevin J. Orsini

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**CRAVATH, SWAINE & MOORE LLP**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
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cc: All Counsel of Record (via CM/ECF)